



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 33 TO FACILITY OPERATING LICENSE NO. NPF-39

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNIT 1

DOCKET NO. 50-352

1.0 INTRODUCTION

By letter dated May 26, 1989, as supplemented by letter dated August 7, 1989, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. The proposed amendment would make administrative changes to the Technical Specifications (TS) to correct grammatical and typographical errors, eliminate notes that no longer apply and improve accuracy.

2.0 EVALUATION

The proposed changes relate to 74 pages of the Limerick Unit 1 Technical Specifications. To take advantage of the large number of similar changes, the changes are grouped into three categories.

Category 1 changes correct simple typographical or grammatical errors and add page headings where they have been omitted. An example of a heading addition is found on Index pages i, ii, iv, vi, via and xviii. The page heading "Index" had been omitted from previous TS revisions. Index pages vii and xii add headings for "Reactor Coolant System" and "Instrumentation," which also had been omitted from previous revisions. Examples of simple typographical corrections are found on page 3/4 3-19, where "HPCI" is misspelled, and page 3/4 3-34, where entries in two tabular columns do not line up properly. Category 1 changes are the most numerous in this proposed Amendment with 44 corrections.

Category 2 changes eliminate notes and clauses that no longer apply to Limerick Unit 1. For example, the double asterisk (\*\*) note on page 3/4 6-4 is deleted because it applies to a valve test program extension that expired in May of 1986. Similarly, the single asterisk entries in the inboard and outboard isolation barrier column of Table 3.6.3-1 (pages 3/4 6-19, 20, 21, 24, 25 and 27) are the valves to which the expired valve test program applied. The asterisk that identified each of these valves as being part of the valve test program extension is deleted. (The double asterisk note on page 3/4 6-18 was previously deleted in Amendment 22 dated June 22, 1989.) There are 13 proposed Category 2 changes.

Category 3 changes are proposed to correct transcription errors in component designations and setpoints. These changes will ensure accuracy

and consistency between design documents and the Technical Specifications. For example, the double asterisk notes on pages 3/4 3-37 and 55 contain an error in converting indicated water level from inches to feet. The correct indicated water level is 2 feet 4 inches which corresponds to 2.3 feet (vice 2.25 feet). Similarly, the north stack instrument room on the 412' elevation is not room 712, but room 713 (page 3/4 3-96). There are 22 such transcription errors in the proposed amendment.

It should be noted that the total number of corrections does not add up to the 74 proposed TS changes mentioned above. This is because the 74 changes refer to the total number of TS pages changed. However, some pages have several changes that appear in multiple categories, so that the total number of changes obtained by adding changes by category (79) is greater than the 74 TS pages changed. The difference (5) represents those pages having changes in multiple categories.

During the staff's review of the application, two minor administrative errors were noted. The specific items were: 1) on index page xvi, the title at the top of the page, "Refueling Operations" should have been underlined to be consistent with the format of other index pages, and 2) on page 3/4 6-42, the vertical line in the right hand margin should have reflected that three lines rather than two were being revised in Note 16. As a courtesy, the licensee was advised of the corrections and concurred with the changes made by the staff. The licensee submitted revised pages in their letter dated August 7, 1989. The amended pages did not add, delete, modify or change any words in the original submittal and thus do not affect the No Significant Hazards Consideration notice.

### 3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### 4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (54 FR 29408) on July 12, 1989 and consulted with the State of Pennsylvania. No public comments were received and the State of Pennsylvania had no comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

Principal Contributor: Ed Trottier

Dated: October 30, 1989